

ESTTA Tracking number: **ESTTA393023**

Filing date: **02/11/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91196444
Applicant	Defendant Jonathan A. Naguit
Other Party	Plaintiff Penske Systems, Inc.

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 02/13/2011. Jonathan A. Naguit requests that such date be extended for 30 days, or until 03/15/2011, and that all subsequent dates be reset accordingly.

Time to Answer :	03/15/2011
Deadline for Discovery Conference :	04/14/2011
Discovery Opens :	04/14/2011
Initial Disclosures Due :	05/14/2011
Expert Disclosure Due :	09/11/2011
Discovery Closes :	10/11/2011
Plaintiff's Pretrial Disclosures :	11/25/2011
Plaintiff's 30-day Trial Period Ends :	01/09/2012
Defendant's Pretrial Disclosures :	01/24/2012
Defendant's 30-day Trial Period Ends :	03/09/2012
Plaintiff's Rebuttal Disclosures :	03/24/2012
Plaintiff's 15-day Rebuttal Period Ends :	04/23/2012

The grounds for this request are as follows:

- *ON JUNE 22, 2010 THE TRADEMARK APPLICATION BY THE APPLICANT WAS PUBLISHED FOR OPPOSITION FOR 30 DAYS. ON THE 29TH DAY, 7/21/10, THE OPPOSER, PENSKE SYSTEM, INC, HAS FILED A 60-DAY EXTENSION TO FILE FOR OPPOSITION WHICH WAS GRANTED BY THE TRADEMARK OFFICE, ALLOWING THE OPPOSITION TOTAL OF NINETY (90) DAYS PRIOR TO FILING THE ACTUAL OPPOSITION. WHEREFORE, APPLICANT RESPECTFULLY REQUESTS TO ALSO BE GRANTED THE EXTENSION TO SUSPEND THE PROCEEDING FOR THIRTY (30) DAYS TO ALLOW THE APPLICANT TIME TO EMPLOY A NEW COUNSEL WHO IS MORE FAMILIAR WITH TRADEMARK PROCEEDINGS.*

Jonathan A. Naguit has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Jonathan A. Naguit has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,
/J.NAGUIT/
JONATHAN A. NAGUIT

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